

# **EXHIBIT G**

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

JOHNNY HA, JENNY PHAM, A/K/A  
JENNY HA, AND HELEN LE,  
Plaintiffs,

v.

TINA CONN,  
Defendant.

Docket No. 2:20-cv-155-wks

**DEFENDANT'S RESPONSES TO PLAINTIFFS' REQUESTS FOR ADMISSION TO  
TINA CONN**

Defendant in the above-captioned action, Ms. Tina Conn, by and through counsel of record Langrock Sperry & Wool, LLP, objects and responds to Plaintiffs' Requests for Admission as follows:

**REQUESTS FOR ADMISSIONS**

1. Admit that Video #1 is genuine.

**ANSWER: Admit.**

2. Admit that you published Video #1 to YouTube and/or to the Internet.

**ANSWER: Admit.**

3. Admit that Video #1 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

4. Admit that it is you speaking in Video #1.

**ANSWER: Admit.**

5. Admit that it is you visible in Video #1.

**ANSWER: Admit.**

6. Admit that Video #1 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

7. Admit that the Vietnamese-to-English translation of Video #1 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

8. Admit that the Vietnamese-to-English translation of Video #1 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

9. Admit that you have no documents, communications or other evidence to support your statements in Video #1 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

10. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #1.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

11. Admit that Video #2 is genuine.

**ANSWER: Admit.**

12. Admit that you published Video #2 to YouTube and/or to the Internet.

**ANSWER: Admit.**

13. Admit that Video #2 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

14. Admit that it is you speaking in Video #2.

**ANSWER: Admit.**

15. Admit that it is you visible in Video #2.

**ANSWER: Admit.**

16. Admit that Video #2 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

17. Admit that the Vietnamese-to-English translation to Video #2 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

18. Admit that the Vietnamese-to-English translation of Video #2 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

19. Admit that you have no documents, communications or other evidence to support your statements in Video #2 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

20. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #2.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

21. Admit that Video #3 is genuine.

**ANSWER: Admit.**

22. Admit that you published Video #3 to YouTube and/or the internet.

**ANSWER: Admit.**

23. Admit that Video #3 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

24. Admit that it is you speaking in Video #3.

**ANSWER: Admit.**

25. Admit that it is you visible in Video #3.

**ANSWER: Admit.**

26. Admit that Vide #3 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

27. Admit that the Vietnamese-to-English translation of Video #3 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

28. Admit that the Vietnamese-to-English translation of Video #3 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

29. Admit that you have no documents, communications or other evidence to support your statements in Video #3 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

30. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #3.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

31. Admit that Video #4 is genuine.

**ANSWER: Admit.**

32. Admit that you published Video #4 to YouTube and/or to the Internet.

**ANSWER: Admit.**

33. Admit that Video #4 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

34. Admit that it is you speaking in Video #4.

**ANSWER: Admit.**

35. Admit that it is you visible in Video #4.

**ANSWER: Admit.**

36. Admit that Video #4 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

37. Admit that the Vietnamese-to-English translation of Video #4 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

38. Admit that the Vietnamese-to-English translation of Video #4 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

39. Admit that you have no documents, communications or other evidence to support your statements in Video #4 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

40. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #4.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

41. Admit that Video #5 is genuine.

**ANSWER: Admit.**

42. Admit that you published Video #5 to YouTube and/or to the Internet.

**ANSWER: Admit.**

43. Admit that Video #5 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

44. Admit that it is you speaking in Video #5.

**ANSWER: Admit.**

45. Admit that it is you visible in Video #5.

**ANSWER: Admit.**

46. Admit that Video #5 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

47. Admit that the Vietnamese-to-English translation of Video #5 in the Amended Complaint is accurate and substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

48. Admit that the Vietnamese-to-English translation of Video #5 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

49. Admit that you have no documents, communications or other evidence to support your statements in Video #5 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

50. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #5.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

51. Admit that Video #6 is genuine.

**ANSWER: Admit.**

52. Admit that you published Video #6 to YouTube and/or to the Internet.

**ANSWER: Admit.**

53. Admit that Video #6 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

54. Admit that it is you speaking in Video #6.

**ANSWER: Admit.**

55. Admit that it is you visible in Video #6.

**ANSWER: Admit.**

56. Admit that Video #6 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

57. Admit that the Vietnamese-to-English translation of Video #6 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

58. Admit that the Vietnamese-to-English translation of Video #6 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

59. Admit that you have no documents, communications or other evidence to support your statements in Video #6 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

60. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #6.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

61. Admit that Video #7 is genuine.

**ANSWER: Admit.**

62. Admit that you published Video #7 to YouTube and/or to the Internet.

**ANSWER: Admit.**

63. Admit that Video #7 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

64. Admit that it is you speaking in Video #7.

**ANSWER: Admit.**

65. Admit that it is you visible in Video #7.

**ANSWER: Admit.**

66. Admit that Video #7 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

67. Admit that the Vietnamese-to-English translation of Video #7 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

68. Admit that the Vietnamese-to-English translation of Video #7 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

69. Admit that you have no documents, communications or other evidence to support your statements in Video #7 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

70. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #7.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

71. Admit that Video #8 is genuine.

**ANSWER: Admit.**

72. Admit that you published Video #8 on YouTube and/or to the Internet.

**ANSWER: Admit.**

73. Admit that Video #8 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

74. Admit that it is you speaking in Video #8.

**ANSWER: Admit.**

75. Admit that it is you visible in Video #8.

**ANSWER: Admit.**

76. Admit that Video #8 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

77. Admit that the Vietnamese-to-English translation of Video #8 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

78. Admit that the Vietnamese-to-English translation of Video #8 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

79. Admit that you have no documents, communications or other evidence to support your statements in Video #8 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint**

80. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #8.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

81. Admit that Video #9 is genuine.

**ANSWER: Admit.**

82. Admit that you published Video #9 to YouTube and/or to the Internet.

**ANSWER: Admit.**

83. Admit that Video #9 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

84. Admit that it is you speaking in Video #9.

**ANSWER: Admit.**

85. Admit that it is you visible in Video #9.

**ANSWER: Admit.**

86. Admit that Video #9 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

87. Admit that the Vietnamese-to-English translation of Video #9 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

88. Admit that the Vietnamese-to-English translation of Video #9 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

89. Admit that you have no documents, communications or other evidence to support your statements in Video #9 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

90. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #9.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

91. Admit that Video #10 is genuine.

**ANSWER: Admit.**

92. Admit that you published Video #10 to YouTube and/or to the Internet.

**ANSWER: Admit.**

93. Admit that Video #10 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

94. Admit that it is you speaking in Video #10.

**ANSWER: Admit.**

95. Admit that it is you visible in Video #10.

**ANSWER: Admit.**

96. Admit that Video #10 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

97. Admit that the Vietnamese-to-English translation of Video #10 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

98. Admit that the Vietnamese-to-English translation of Video #10 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

99. Admit that you have no documents, communications or other evidence to support your statements in Video #10 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

100. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #10.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

101. Admit that Video #11 is genuine.

**ANSWER: Admit.**

102. Admit that you published Video #11 to YouTube and/or to the Internet.

**ANSWER: Admit.**

103. Admit that Video #11 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

104. Admit that it is you speaking in Video #11.

**ANSWER: Admit.**

105. Admit that it is you visible in Video #11.

**ANSWER: Admit.**

106. Admit that Video #11 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

107. Admit that the Vietnamese-to-English translation of Video #11 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

108. Admit that the Vietnamese-to-English translation of Video #11 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

109. Admit that you have no documents, communications or other evidence to support your statements in Video #11 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

110. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #11.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

111. Admit that Video #12 is genuine.

**ANSWER: Admit.**

112. Admit that you published Video #12 to YouTube and/or to the Internet.

**ANSWER: Admit.**

113. Admit that Video #12 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

114. Admit that it is you speaking in Video #12.

**ANSWER: Admit.**

115. Admit that it is you visible in Video #12.

**ANSWER: Admit.**

116. Admit that Video #12 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

117. Admit that the Vietnamese-to-English translation of Video #12 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

118. Admit that the Vietnamese-to-English translation of Video #12 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

119. Admit that you have no documents, communications or other evidence to support your statements in Video #12 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

120. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #12.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

121. Admit that Video #13 is genuine.

**ANSWER: Admit.**

122. Admit that you published Video #13 to YouTube and/or to the Internet.

**ANSWER: Admit.**

123. Admit that Video #13 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

124. Admit that it is you speaking in Video #13.

**ANSWER: Admit.**

125. Admit that it is you visible in Video #13.

**ANSWER: Admit.**

126. Admit that Video #13 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

127. Admit that the Vietnamese-to-English translation of Video #13 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

128. Admit that the Vietnamese-to-English translation of Video #13 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

129. Admit that you have no documents, communications or other evidence to support your statements in Video #13 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

130. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #13.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

131. Admit that Video #14 is genuine.

**ANSWER: Admit.**

132. Admit that you published Video #14 to YouTube and/or to the Internet.

**ANSWER: Admit.**

133. Admit that Video #14 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

134. Admit that it is you speaking in Video #14.

**ANSWER: Admit.**

135. Admit that it is you visible in Video #14.

**ANSWER: Admit.**

136. Admit that Video #14 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

137. Admit that the Vietnamese-to-English translation of Video #14 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

138. Admit that the Vietnamese-to-English translation of Video #14 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

139. Admit that you have no documents, communications or other evidence to support your statements in Video #14 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

140. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #14.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

141. Admit that Video #15 is genuine.

**ANSWER: Admit.**

142. Admit that you published Video #15 to YouTube and/or to the Internet.

**ANSWER: Admit.**

143. Admit that Video #15 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

144. Admit that it is you speaking in Video #15.

**ANSWER: Admit.**

145. Admit that it is you visible in Video #15.

**ANSWER: Admit.**

146. Admit that Video #15 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

147. Admit that the Vietnamese-to-English translation of Video #15 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

148. Admit that the Vietnamese-to-English translation of Video #15 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

149. Admit that you have no documents, communications or other evidence to support your statements in Video #15 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

150. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #15.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

151. Admit that Video #16 is genuine.

**ANSWER: Admit.**

152. Admit that you published Video #16 to YouTube and/or to the Internet.

**ANSWER: Admit.**

153. Admit that Video #16 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

154. Admit that it is you speaking in Video #16.

**ANSWER: Admit.**

155. Admit that it is you visible in Video #16.

**ANSWER: Admit.**

156. Admit that Video #16 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

157. Admit that the Vietnamese-to-English translation of Video #16 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

158. Admit that the Vietnamese-to-English translation of Video #16 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

159. Admit that you have no documents, communications or other evidence to support your statements in Video #16 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

160. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #16.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

161. Admit that Video #17 is genuine.

**ANSWER: Admit.**

162. Admit that you published Video #17 to YouTube and/or to the Internet.

**ANSWER: Admit.**

163. Admit that Video #17 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

164. Admit that it is you speaking in Video #17.

**ANSWER: Admit.**

165. Admit that it is you visible in Video #17.

**ANSWER: Admit.**

166. Admit that Video #17 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

167. Admit that the Vietnamese-to-English translation of Video #17 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

168. Admit that the Vietnamese-to-English translation of Video #17 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

169. Admit that you have no documents, communications, or other evidence to support your statements in Video #17 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

170. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #17.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

171. Admit that Video #18 is genuine.

**ANSWER: Admit.**

172. Admit that you published video #18 to YouTube and/or to the Internet.

**ANSWER: Admit.**

173. Admit that Video #18 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

**ANSWER: Admit.**

174. Admit that it is you speaking in Video #18.

**ANSWER: Admit.**

175. Admit that it is you visible in Video #18.

**ANSWER: Admit.**

176. Admit that Video #18 was heard and/or viewed by persons other than Plaintiffs and you.

**ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.**

177. Admit that the Vietnamese-to-English translation of Video #18 in the Amended Complaint is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

178. Admit that the Vietnamese-to-English translation of Video #18 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

**ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.**

179. Admit that you have no documents, communications or other evidence to support your statements in Video #18 that are quoted in the Amended Complaint.

**ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.**

180. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #18.

**ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.**

181. Admit that you have no documents or communications that support or otherwise relate to your affirmative defense of “Consent.”

**ANSWER: Denied.**

182. Admit that you have no documents or communications that support or otherwise relate to your affirmative defense of “Unclean hands.”

**ANSWER: Denied.**

183. Admit that you have no documents or communications that support or otherwise relate to your affirmative defense of “Truth.”

**ANSWER: Denied.**

DATED at Burlington, Vermont this 6<sup>th</sup> day of July, 2023.

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Tina Conn

As to objections:

LANGROCK SPERRY & WOOL, LLP



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